

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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(Admitted *pro hac vice*)

*ATTORNEYS FOR DEBTOR*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

**Hearing Date:**

July 26, 2022 at 10:00 a.m.

**DECLARATION OF DAN B. PRIETO**

I, Dan B. Prieto, hereby declare under penalty of perjury:

1. I am of counsel of the law firm of Jones Day, and my office is located at 2727 North Harwood Street, Dallas, Texas 75201. I am a member in good standing of the Bar of the State of Texas. My application to appear pro hac vice in this case has been granted by this Court. There are no disciplinary proceedings pending against me.

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

2. I submit this declaration (the “Declaration”) in connection with the *Debtor’s Memorandum on the Need for Estimation* filed contemporaneously herewith. I have personal knowledge of the matters set forth herein.

3. Attached hereto as **Exhibit A** is a true and correct copy of Rogers, JC, WITNESS PREPARATION MEMOS RAISE QUESTIONS ABOUT ETHICAL LIMITS, ABA/BNA Lawyers’ Manual on Professional Conduct (Feb. 18, 1998).

4. Attached hereto as **Exhibit B** is a true and correct copy of an excerpt from the transcript of the October 22, 2020 hearing in In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C.).

5. Attached hereto as **Exhibit C** is a true and correct copy of Mealey’s Asbestos Bankruptcy Report, *Where Are They Now, Part Seven: An Update On Developments In Asbestos-Related Bankruptcy Cases* (July 2014).

6. Attached hereto as **Exhibit D** is a true and correct copy of Mealey’s Asbestos Bankruptcy Report, *Where Are They Now, Part Five: An Update On Developments In Asbestos-Related Bankruptcy Cases* (March 2009).

7. Attached hereto as **Exhibit E** is a true and correct copy of the Declaration of Charles E. Bates PhD submitted in connection with *Debtor’s Motion for Order Pursuant to Bankruptcy Rule 2004 Directing Submission of Personal Injury Questionnaires by Pending Mesothelioma Claimants* [Dkt. 417] in In re DBMP LLC, No. 20-30080 (JCW) (Bankr. W.D.N.C.).

8. Attached hereto as **Exhibit F** is a true and correct copy of the August 27, 2021 Deposition of Daniel L. Clarke-Peterson in In re Johnson & Johnson Talcum Products

Marketing, Sales Practices, and Products Liability Litigation, MDL-No. 16-2738 (FLW) (LHG)  
(D.N.J.)

9. Attached hereto as **Exhibit G** is a true and correct copy of an excerpt from the transcript of the July 27, 2016 hearing in In re Garlock Sealing Techs. LLC, No. 10-31607 (JCW) (Bankr. W.D.N.C.).

10. Attached hereto as **Exhibit H** is a true and correct copy of an excerpt from the transcript of the March 31, 2022 hearing in In re Aldrich Pump LLC, No. 20-30608 (JCW) (Bankr. W.D.N.C.).

11. Attached hereto as **Exhibit I** is a true and correct copy of an excerpt from the transcript of the May 18, 2022 hearing in In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C.).

12. Attached hereto as **Exhibit J** is a true and correct copy of an excerpt from the transcript of the October 19, 2021 hearing in In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C.).

13. Attached hereto as **Exhibit K** is a true and correct copy of an excerpt from the transcript of the March 3, 2022 hearing in In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C.).

14. Attached hereto as **Exhibit L** is a true and correct copy of an excerpt from the transcript of the March 4, 2021 hearing in In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C.).

15. Attached hereto as **Exhibit M** is a true and correct copy of an excerpt from the transcript of the January 20, 2022 hearing in In re Bestwall LLC, No. 17-31795 (LTB) (Bankr. W.D.N.C.).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing  
is true and correct to the best of my knowledge and belief.

Dated: July 15, 2022  
Dallas, TX

Respectfully submitted,

/s/ Dan B. Prieto  
Dan B. Prieto